

DOCKET SECTION

BEFORE THE

**POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**DOUGLAS F. CARLSON
FOLLOW-UP INTERROGATORY
TO UNITED STATES POSTAL SERVICE
WITNESS JOE ALEXANDROVICH
(DFC/USPS-T5-16)**

November 12, 1997

Pursuant to sections 25 and 26 of the *Rules of Practice* and section 2(D) of the *Special Rules of Practice*, I, Douglas F. Carlson, hereby submit this follow-up interrogatory to United States Postal Service witness Joe Alexandrovich. I received the interrogatory response on which I am following up on November 7, 1997.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. Otherwise, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Fronk (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

Dated: November 12, 1997



DOUGLAS F. CARLSON

DFC/USPS-T5-16.

a. Do you believe that stamped cards are less expensive to process than private post cards? (Note that this question does not ask you to agree that the cost differential is any particular number of cents; I am asking only for confirmation that the cost of processing stamped cards is lower than the cost of processing private post cards.) If your answer is anything other than an unqualified yes, please explain your answer fully, reconcile your answer with the data provided in Attachment 1 to Response to DFC/USPS-T5-2(b), and provide copies of all data, studies, and documents that support your position.

b. Please refer to your response to DFC/USPS-T5-13, where you stated, "Please note that if data collectors are identifying postal cards as belonging to the larger category of private postcards, then postal card costs could be understated." Please provide a complete explanation, using a numerical example if necessary, of why postal-card costs would be understated in the situation that you described.

c. Assume that the cost of processing stamped cards is lower than the cost of processing private post cards. If a stamped card, with its lower cost characteristics, were mistakenly identified as a private post card, please explain why assignment of the processing costs for this stamped card to the private-post-cards category would not cause the processing costs for *private post cards* to be understated.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

November 12, 1997
Emeryville, California